

Mao Declaration
EXHIBIT B
Redacted Version of
Document Sought to be Sealed

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

3 CHASOM BROWN, WILLIAM BYATT,
4 JEREMY DAVIS, CHRISTOPHER
5 CASTILLO, and MONIQUE TRUJILLO,
6 individually and on behalf of themselves and
7 all others similarly situated,

8 Plaintiffs,

9 vs.

10 GOOGLE LLC,

11 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

12 **DECLARATION OF MARTIN SRAMEK IN RESPONSE TO MAY 20, 2022 ORDER**

13 I, Martin Sramek, declare as follows:

14 1. I am the Privacy Working Group lead for Chrome. I have been employed at Google
15 since October 2014, and have worked on issues related to Chrome privacy for the duration of my
16 tenure. I make this declaration based on personal knowledge and information provided to me by
17 Google colleagues and, if called to testify, I could and would competently testify to such facts.18 2. I understand that the Court has ordered “Google must provide Plaintiffs with a
19 representation in writing no later than May 31, 2022 that other than the logs identified thus far as
20 containing Incognito-detection bits, no other such logs exist.”21 3. I understand that Google has previously identified the following non-duplicative logs
22 as containing Chrome Incognito-detection bits.

#	Log Name	Incognito-Detection Bit
1	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
2	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field

1	3	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
2	4	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
3	5	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
4	6	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
5	7	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
6	8	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
7	9	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
8	10	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
9	11	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
10	12	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
11	13	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
12	14	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
13	15	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
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1	16	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
2	17	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
3	18	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
4	19	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_ads_identity_team field
5	20	[REDACTED]	is_chrome_non_incognito_mode
6	21	[REDACTED]	is_chrome_non_incognito_mode
7	22	[REDACTED]	is_chrome_non_incognito_mode
8	23	[REDACTED]	is_chrome_incognito
9	24	[REDACTED]	is_chrome_incognito

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19 4. As the Privacy Working Group lead for Chrome, I have experience responding to
20 requests by Googlers related to inferring Incognito mode on Chrome. Based on my experience, I
21 was only aware of the logs and bits listed above. At my direction and with my involvement and
22 supervision, Google employees took the following additional steps to comply with the Court's
23 directive that Google verify whether other such logs exist: (i) conduct code search to identify
24 responsive code potentially related to Incognito-detection bits and (ii) survey teams responsible for
25 responsive code.

26 5. The investigation for purposes of complying with the Court's order began on May
27 23, 2022. The investigation is ongoing and should be completed within the next two weeks, by June
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1 14, 2022. I reserve the right to supplement my attestation with any additional finding resulting from
2 this continued investigation.

3 6. I understand that the is_chrome_non_incognito_mode field is incorporated in the
4 GWS proto. When searched using the GoogleSQL tool, other logs built on the GWS proto may
5 display the default “0” value for that field. One example of a log built on the GWS proto that, when
6 searched with the Google SQL tool, will display is_chrome_non_incognito_mode and a value of
7 “0” for every entry, regardless of what the logic of the bit indicates the value should be, is
8 [REDACTED] I have not identified these logs as logs “containing Chrome Incognito-
9 detection bits” because the Incognito-detection bits in these logs always default to “0” and not the
10 value that would be dictated by following the logic of the bit.

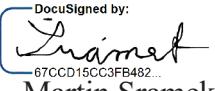
11 I declare under penalty of perjury of the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on the 31st day of May 2022 at Munich, Germany.

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By: 
67CCD15CC3FB482...
Martin Sramek

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